

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION)

In re:

IDL DEVELOPMENT, INC.,
Debtor.

Chapter 11
Case No. 18-14808-CJP

**VERIFIED STATEMENT BY CHAPTER 11 TRUSTEE
PURSUANT TO FED. R. BANKR. P. 2007.1(c)**

David B. Madoff, the Chapter 11 Trustee appointed by the United States Trustee in this case, makes the following statement under the pains and penalties of perjury:

1. I have reviewed the Schedules, Docket, Creditor Matrix and certain other documents related to this case. Based on that review, I hereby state that I have no connections with the Debtor, creditors or any other person in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except as set forth below:

2. I have worked on many cases in the past that have also involved Attorney Anne While, who is the Examiner in this case, as well as the attorneys at Murphy & King, counsel for the Debtor.

3. I am a member of the Chapter 7 trustee panel, which is appointed by the United States Trustee.

4. I understand that, in the 1990's, the principals of the Debtor, Messrs. Sousa and Nagel, formerly worked for or held a stake in Molten Metal Technology, which was previously a Chapter 11 debtor before this Court. At that time, I was an associate attorney for the law firm of Cohn & Kelakos, which was the debtor's counsel. I worked as an associate on the bankruptcy

case. But, I do not know either Mr. Sousa or Mr. Nagel, and do not recall working with them.

Executed under the pains and penalties of perjury this 15th day of November, 2019.

/s/ David B. Madoff
David B. Madoff (BBO#552968)
MADOFF & KHOURY LLP
124 Washington Street
Foxboro, MA 02035
508-543-0040
madoff@mandkllp.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 15, 2019, he caused copies of the foregoing to be served by ECF on all parties that have requested notice in this case.

/s/ David B. Madoff
David B. Madoff (BBO#552968)